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*Attorneys for Defendant*  
*NETFLIX, INC.*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

LAURI VALJAKKA,

*Plaintiff,*

v.

NETFLIX, INC.,

*Defendant.*

Case No. 4:22-cv-01490-JST

**DECLARATION OF ELISE EDLIN IN  
SUPPORT OF DEFENDANT NETFLIX,  
INC.'S ADMINISTRATIVE MOTION TO  
FILE DOCUMENTS UNDER SEAL**

Judge: Hon. Jon S. Tigar

I, Elise Edlin, hereby declare:

1. I am an attorney with the law firm Perkins Coie LLP, based in San Francisco, California, and counsel representing Defendant Netflix, Inc. I have personal knowledge of the facts set forth in this declaration and am competent to testify. I make this declaration pursuant to Civil Local Rule 79-5(e) in support of Netflix's Administrative Motion to File Under Seal Portions of Exhibit A to the Unopposed Motion for Leave to Supplement Its Responsive Damages Contentions.

2. I am submitting this declaration in support of the Defendant Netflix, Inc.'s Administrative Motion to File Documents Under Seal.

3. The portions of the exhibits that Defendant seeks to seal, with the reasons for each request, are set forth below:

| Name of Document   | Portion(s) to Seal          | Reason for Sealing  |
|--|-----------------------------|---|
| Exhibit A to the Unopposed Motion for Leave to Supplement Its Responsive Damages Contentions | Redactions on Pgs. 2 and 4. | Due to the discussion of Valjakka's allegations regarding Netflix's potential liability and the limited nature of the proposed sealing, the request to seal is narrowly tailored in order to protect Netflix's confidential information. Netflix has invested significant financial and technical resources in developing its proprietary technologies, and public dissemination of the document proposed for sealing could cause Netflix competitive and financial harm. |

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge.

Executed on June 20, 2023 in Oakland, California.

/s/ Elise S. Edlin  
Elise S. Edlin